



COALITION21

Supporting Tomorrow's Technologies With Facts ♦ Not Fears!
P.O. Box 51232 ♦ Idaho Falls, Idaho 83405 ♦ 208-528-2161 ♦ FAX: 528-2199

RECEIVED

September 9, 1998

SEP 14 1998

John Medema,
AMWTP EIS Document Manager
DOE-Idaho Operations Office, MS 1117
850 Energy Drive
Idaho Falls, ID 83401

AMWTP OFFICE

#029

Coalition 21 Comments on the Draft Environmental Impact Statement for the
Advanced Mixed Waste Treatment Process

1. The DEIS generally describes the process, the reasons for it, and the environmental consequences in sufficient detail to satisfy a reasonable person. It would not have been advisable to spend the resources to answer every conceivable question on the process in advance. However we do have a few suggestions for elaboration on specific points.
2. An additional reason for the AMWTP should be mentioned. The AMWTP will reduce the space requirements in the WIPP. The WIPP has been very expensive. Disposal space there should be used as economically as possible. The DEIS should explain that for this reason the indirect environmental impact of the AMWTP will be positive. As shown in the DEIS, the direct environmental impacts are negligible.
3. The description of the operation of the incinerator, vitrification, and macroencapsulation (grouting) is adequate.
4. The one-line specification of the efficiency of HEPA filters should be amplified to emphasize the fact that outside the 0.1-0.3 micron range, the filters are even more efficient than the 99.97% efficiency which applies inside this range. Also, explaining the differing trapping mechanisms--between fibers for larger particles and within fibers for smaller particles--would make this more plausible to technically knowledgeable members of the public. Such a brief explanation is needed because doubts about HEPA filters are frequently raised in public meetings, and seldom, if ever, countered with a knowledgeable response.
5. We also suggest that a brief discussion of the toxicity of plutonium be included in Appendix E, because of widespread public concern about this element.
6. There should be no public objection to any of the thermal methods of treatment previously or presently proposed. Even the most critical individuals and groups have enthusiastically endorsed vitrifying large quantities of surplus weapons plutonium. It would be inconsistent of them to object to vitrifying waste containing only trace amounts of plutonium.